

MEMO ENDORSED

DIRECT DIAL
212-735-2995
DIRECT FAX
917-777-2995
EMAIL ADDRESS
JOCELYN.STRAUBER@SKADDEN.COM

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
ONE MANHATTAN WEST
NEW YORK, NY 10001

TEL: (212) 735-3000
FAX: (212) 735-2000
WWW.SKADDEN.COM

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August 3, 2021

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Velez*, 19 Cr. 862 (Deeshuntee Stevens)

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, to respectfully request permission for Mr. Stevens to travel from Rochester, NY, to attend an annual family reunion in Carteret, NJ, on August 7 and to spend his birthday in New York City with his daughters on August 8. If granted permission, Mr. Stevens would travel by bus and/or car to the family reunion in New Jersey, from Rochester on the morning of August 7. He would travel from New Jersey to New York City on the evening of August 7, spend the night of August 7 at a hotel in the Bronx near the home of Melissa Blondet, one of the co-signors for Mr. Stevens' bond and the mother of Mr. Stevens' two youngest daughters, and then return to Rochester from New York City on the night of August 8.

The family reunion on August 7 will be held from around 1 p.m. to 8 p.m. outside at Carteret Park. There will be around 30 attendees, including family

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members and close friends of Mr. Stevens.¹ On August 8, Mr. Stevens would celebrate his birthday with his thirteen and eight-year-old daughters in the Bronx. As Mr. Stevens is fully vaccinated, his participation in these gatherings would be consistent with current CDC guidelines, which permit fully vaccinated people to "resume activities that [they] did prior to the pandemic."²

If the Court is not inclined to permit Mr. Stevens to attend the family reunion in New Jersey or to stay overnight in New York City, then he respectfully requests permission to travel by train to New York City on the morning of August 8 to celebrate his birthday with his daughters in the Bronx. He would return to Rochester by bus on the night of August 8. He would not stay overnight in New York City.

Pretrial Services has informed us that it opposes Mr. Stevens' request, noting that Mr. Stevens remains on home detention and that Pretrial Services "opposes requests for social events." The United States Attorney's Office defers to Pretrial Services' position on this request.

As the Court is aware, on June 10, 2021, Mr. Stevens pled guilty before your Honor to conspiring to distribute heroin and fentanyl in violation of 21 U.S.C. §§ 841(b)(1)(B) and 846. Your Honor permitted Mr. Stevens to remain on bail on the same conditions of release initially imposed on August 21, 2020. Those conditions include: (1) a \$100,000 personal recognizance bond, signed by Mr. Stevens and co-signed by three financially responsible persons; (2) home detention with electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend serving as third-party custodian; and (3) travel restricted to the state of New York.

¹ There are currently no restrictions on the size of outdoor (or indoor) gatherings in New Jersey. New Jersey COVID-19 Information Hub, *How can people safely get together? What are the limits for indoor and outdoor gatherings?*, <https://covid19.nj.gov/faqs/nj-information/reopening-guidance-and-restrictions/how-can-people-safely-get-together-what-are-the-limits-for-indoor-and-outdoor-gatherings> ("There are no numerical limits for indoor or outdoor gatherings.") (last updated Jun. 4, 2021).

² Centers for Disease Control and Prevention, *Interim Public Health Recommendations for Fully Vaccinated People*, <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html> (last updated Jul. 27, 2021).

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As the Court is also aware, Mr. Stevens has traveled to New York City with the Court's permission for family events and legal visits twice since he entered his guilty plea and on several prior occasions. Those trips were without incident.

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson
Assistant U.S. Attorney Elinor L. Tarlow
U.S. Pretrial Services Officer Jonathan Lettieri
U.S. Pretrial Services Officer Jeremy Bedette

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

Date: August 3, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE